



**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

Bruce A. Babcock

Plaintiff(s)

vs.

First Methodist Church of Trumansburg

Defendant(s)

Civil Case No.:

**COMPLAINT PURSUANT
TO THE AMERICANS
WITH DISABILITIES ACT**

Plaintiff(s) demand(s) a trial by: ☒ JURY ☐ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking judgment, relief and/or damages brought pursuant to the Americans with Disabilities Act, 42 U.S.C. § 12101 *et seq.*, as amended, for discrimination based upon a disability and the failure to accommodate same. This Court has jurisdiction of this action pursuant to 28 U.S.C. §§ 1331 and 1343(4).

PARTIES

2. a. Plaintiff: Bruce A. Babcock

Address: 33 E. Main St.

Trumansburg, NY 14886

- b. Plaintiff: _____

Address: _____

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Jeff Losey
- Official Position: Pastor
- Address: 80 E. Main St.
- Trumansburg, NY 14886
-
- b. Defendant:
- Official Position:
- Address:
-
-

Additional Defendants may be added on a separate sheet of paper.

4. My disability is as follows:
- I am blind due to a car accident in January of 1979. Currently, I have a service dog named "Bronx" to assist me with navigation.

5. The conduct complained of in this action involves:
(Check all that apply)

- (A) ☐ Failure to employ.
- (B) ☐ Termination of employment.
- (C) ☒ Denial of participation in public service or program.
- (D) ☐ Failure to make alterations to accommodate disability.
- (E) ☐ Retaliation.
- (G) ☐ Other acts as specified below:

6. **FACTS**

On the following page, set forth the facts of your case which substantiate your claim of discrimination. List the events in the order they happened, naming defendants involved, dates and places.

Note: Each fact should be stated in a separate paragraph; paragraphs should be numbered sequentially.

You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint.

You may use additional sheets as necessary.

1. Mr. Losey's staff have not allowed me to participate in the New Year's dinner hosted by their church if my service dog is with me. I was embarassed and humiliated due to my disability.

7. **PRAYER FOR RELIEF**

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:
I would like to be compensated for my pain and suffering in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 2/21/17



Signature of Plaintiff(s)
(all Plaintiffs must sign)